

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

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THIS DOCUMENT RELATES TO:

All Actions

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) MDL No. 2419  
) Dkt. No. 1:13-md-2419 (RWZ)  
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**DECLARATION OF ANNIKA K. MARTIN IN SUPPORT OF MOTION FOR  
APPOINTMENT AS *PRO SE* LIAISON**

I, Annika K. Martin, hereby submit this Declaration in support of the PSC's motion to appoint me as *Pro Se* Liaison for this MDL.

1. I am partner in the New York office of Lieff Cabraser Heimann & Bernstein, LLP.

2. While my partner Mark Chalos is a member of the Plaintiffs' Steering Committee in this MDL (and my partner Elizabeth Cabraser is his alternate), I am not personally a member of the PSC in this MDL.

3. Nevertheless, I have been integrally engaged in all aspects of this action since its inception, including drafting pleadings and briefs submitted to this Court, handling discovery-related tasks, and attending and participating in motion hearings and status conferences before this Court.

4. LCHB represents 17 plaintiffs in this MDL, including individuals from Tennessee, Illinois, and New York.

5. I also have relevant experience gleaned from my work on other complex litigation matters; for example, I serve as second-chair to LCHB's position on the Plaintiffs' Steering Committee for *In re Oil Spill by the Oil Rig "Deepwater Horizon" in Gulf of Mexico on April 20, 2010*, MDL 2179 (E.D. La.), and played an extensive role in that litigation, and the subsequent economic and medical settlement negotiations and implementation of those settlements, including having primary responsibility for drafting the notices of those settlements and the 13 claim forms and accompanying instruction booklets used in the economic settlement, and drafting the FAQ section of the settlement website.<sup>1</sup>

6. I am also a key member of LCHB's court-appointed leadership team in *In re General Motors LLC Ignition Switch Litig.*, 14-MD-2543 (S.D.N.Y.), representing plaintiffs from all across the U.S. against GM and other defendants for the plaintiffs' physical and economic injuries caused by GM's allegedly defective vehicles.

7. I have a Juris Doctor from the University of Southern California Gould School of Law and a Bachelor of Science in Journalism from the Medill School of Journalism at Northwestern University.

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<sup>1</sup> See FAQs at <http://www.deepwaterhorizoneconomicsettlement.com/index.php>.

I declare, under the pains and penalties of perjury, that the foregoing is true and correct.

Dated: March 10, 2015



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